

# **Exhibit 2**

---

**From:** Anna Porto  
**Sent:** Friday, January 29, 2021 11:22 AM  
**To:** singular@princelobel.com  
**Cc:** kvp-singular; abhansali@kblfirm.com; mkwun@kblfirm.com; wgs-singularv.google@wolfgreenfield.com  
**Subject:** Singular Computing LLC v. Google LLC, 1:19-cv-12551-FDS - Opposition to Motion to Compel

Counsel,

We'd like to clarify a few issues that came up in the opposition to Google's motion to compel that Singular filed yesterday.

- On the test code, Singular's opposition states that it will produce the test code and output files cited in the FAC and infringement contentions. Can you please provide the date on which Singular will produce both? Please also let us know whether Singular is withholding other documents responsive to RFP No. 68.
- On rog 11, in connection with the opposition, Singular provided Exhibit B, which includes information about the documents Singular incorporated in response to rog 11 under Rule 33(d). Can you please provide the date on which Singular will serve that exhibit as a formal supplement to its interrogatory response?

These issues should be resolved before Google's reply is due on February 4<sup>th</sup>.

Best,  
Anna

---

**Anna Porto**

Keker, Van Nest & Peters LLP  
633 Battery Street  
San Francisco, CA 94111-1809  
415 962 8857 direct | 415 391 5400 main  
[aporto@keker.com](mailto:aporto@keker.com) | [vcard](#) | [keker.com](http://keker.com)  
Pronouns: she/her/hers